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COMPREHENSIVE LONG-TERM ENVIRONMENTAL ACTION NAVY (CLEAN II)
Northern and Central California, Nevada, and Utah
Contract Number N62474-94-D-7609
Contract Task Order No. 0126

Prepared For

DEPARTMENT OF THE NAVY
Amelia Duque, Engineer-in-Charge
Engineering Field Activity West
Naval Facilities Engineering Command
San Bruno, California

FINDING OF SUITABILITY TO LEASE REUSE ZONE 2A
PARCEL T009
NAVAL STATION TREASURE ISLAND

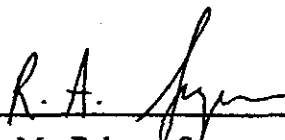
FINAL
August 22, 1997

Prepared By

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1.0 PURPOSE

- a. The purpose of this finding of suitability to lease (FOSL) is to document environmental findings that may impact the proposed lease of Reuse Zone 2A at Naval Station Treasure Island (NAVSTA TI) in San Francisco, California. Reuse Zone 2A consists of Parcel T009. The subject property is described in Section 2.0 and is shown on the figure at the end of this FOSL. The subject property will be leased to the City of San Francisco for commercial or industrial use. The reuse will be consistent with the recent past use. This FOSL is not intended to allow leasing for residential use, such as family housing. The U.S. Department of the Navy (Navy) owns the land and buildings at the subject property.
- b. This FOSL is a result of a thorough analysis of the information contained in the following documents:
 - "Base Realignment and Closure (BRAC) Cleanup Plan, Naval Station Treasure Island," Department of the Navy, Engineering Field Activity West, PRC Environmental Management, Inc. (PRC), March, 1997
 - "Draft Remedial Investigation Report, Naval Station Treasure Island," Department of the Navy, Engineering Field Activity West, PRC, October, 1996
 - "Final Basewide Environmental Baseline Survey Report for Naval Station Treasure Island," ERM-West, Inc., May, 1995 (basewide EBS)
 - "Final Environmental Baseline Survey Sampling Workplan for Naval Station Treasure Island," ERM-West, April, 1996
 - "Final Preliminary Assessment/Site Inspection of Naval Station Treasure Island," Dames & Moore, April, 1988
 - "Final Site-Specific Environmental Baseline Survey (SSEBS) for Reuse Zone 1 at Naval Station Treasure Island," Department of the Navy, Engineering Field Activity West, PRC and Uribe & Associates (U&A), July, 1997
 - "Final Site-Specific Environmental Baseline Survey for Reuse Zone 2 at Naval Station Treasure Island," Department of the Navy, Engineering Field Activity West, PRC and U&A, August, 1997
 - "Guidelines for Evaluation and Control of Lead Based Paint Hazards in Housing," Department of Housing and Urban Development, June, 1995

- "Workplan Abandonment and Removal of Inactive Fuel Pipelines Naval Station Treasure Island, California," Subsurface Consultants, Inc. (SCI), June, 1995

2.0 PROPERTY DESCRIPTION

Reuse Zone 2A, which is located in the eastern portion of NAVSTA TI, encompasses approximately 1.2 acres and consists of Parcel T009. Three small buildings occupy Reuse Zone 2A. Historical information regarding Reuse Zone 2A can be found in the SSEBS for Reuse Zone 2.

Reuse Zone 2A is bounded by Parcel T008 to the west, Parcel T010 to the north, and San Francisco Bay to the east and south. A portion of Installation Restoration (IR) Site 21 is located in Reuse Zone 2A on Parcel T009. No other IR sites are located immediately adjacent to this area.

Three small wooden buildings, Buildings 12A, 12B, and 12C, occupy less than 5 percent of the total parcel area. Building 12A is the harbor master's office. Building 12B is used for parts and tool storage, and as a changing area. Building 12C is a lounge. The remaining parcel area is open space consisting of asphalt and two piers (Piers 11 and 12). Pier 11 was used as a ship's berthing pier from 1948 until it was shortened in 1992. Pier 12 was used as a repair pier before 1993 and is currently used as a small boat pier.

3.0 REGULATORY COORDINATION

The California Department of Toxic Substances Control (DTSC), the California Regional Water Quality Control Board, and the U.S. Environmental Protection Agency (EPA) were notified at the initiation of the SSEBS and this FOSL and were provided with draft versions of the documents to facilitate their consultative role in developing the documents. Regulatory comments received during the FOSL development have been reviewed, addressed, or incorporated into the document as appropriate. A scoping meeting was conducted between the Navy and the regulatory agencies on March 19, 1997, before the SSEBS was conducted and before the FOSL was prepared.

The EPA and DTSC disagree with the U.S. Department of Defense (DoD) guidelines on lead-based paint as presented in Section 6.4 of this FOSL. It is EPA's and DTSC's position that contamination of soil resulting from lead-based paint constitutes a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) release.

4.0 NATIONAL ENVIRONMENTAL POLICY ACT COMPLIANCE

In accordance with the requirements of the National Environmental Policy Act (NEPA) and the Navy's Environmental and Natural Resources Program Manual (OPNAVINST 5090.1B), a NEPA document shall accompany this FOSL.

5.0 ENVIRONMENTAL CONDITION OF THE PROPERTY

Parcel T009 in Reuse Zone 2A is classified as environmental condition of property (ECP) area type 6 because a response action has not yet been implemented at IR Site 21. ECP area type 6 identifies areas of known contamination, where required response actions have not yet been implemented. Based on this ECP classification, Parcel T009 is considered eligible for transfer or lease.

6.0 LEASE NOTIFICATIONS AND RESTRICTIONS

The environmental documents listed in Section 1.b of this FOSL were evaluated to identify environmental factors that require specific restrictions under the lease to preclude threats to human health or the environment, or that require notification to the lessee. The factors that were considered are listed in the table at the end of this FOSL. The factors that require either restrictions or notification are also identified in the table and are discussed in Sections 6.1 through 6.5. The Navy has determined that the remaining factors listed in the table pose no significant threat to human health or the environment and, therefore, require neither restrictions in the lease nor notifications to the lessee. All lease restrictions must also be made part of all subleases within Reuse Zone 2A, and all references to lessees and leases in this document also include all authorized sublessees and subleases.

6.1 INSTALLATION RESTORATION PROGRAM AND AREAS OF CONCERN

A portion of IR Site 21 is located within Reuse Zone 2A on Parcel T009. Volatile organic compounds (VOC), semivolatile organic compounds (SVOC), and petroleum compounds have been detected in soil and groundwater samples collected at IR Site 21 within Reuse Zone 2A. The primary constituents of concern at IR Site 21 are VOCs, including tetrachloroethene, trichloroethene, dichloroethene, vinyl chloride, and toluene, detected in groundwater samples. The detected constituents were evaluated in the risk evaluation presented in the SSEBS for Reuse Zone 2 and are not expected to be of concern for the proposed reuse of Parcel T009. Remedial activities at IR Site 21 are scheduled to begin in approximately three years, and may have an impact on Parcel T009.

Notification. The Navy and recognized regulatory agencies will be allowed unrestricted access to the leased property to conduct investigations and surveys, collect samples, remove fuel lines, perform remediation, access monitoring wells, or engage in other activities associated with the IR and other environmental programs.

Restriction. The lessee will be restricted from conducting excavation, drilling, or other ground-disturbing activities, other than minor repairs of the pavement at Reuse Zone 2A without prior written Navy approval and Navy coordination with applicable federal and state regulatory agencies, as necessary. This lease restriction will not apply to routine landscaping activities. In addition, use of groundwater at NAVSTA TI is prohibited. The lessee will be prohibited from installing any groundwater wells or otherwise using groundwater at the subject property. The lessee shall not damage existing or future groundwater monitoring wells. The lessee will be responsible for any damage it causes to the wells. The lessee shall not interfere with the ongoing IR and other environmental program activities.

It is possible that the lease area may remain accessible to and be occupied by the lessee during any remedial activities; in this case, access restrictions may include requiring the lessee to enter the leased premises via a specific route. Noise, traffic, and other nuisances associated with construction may be expected.

6.2

PETROLEUM PRODUCTS AND DERIVATIVES

Abandoned underground fuel lines beneath Parcel T009 are scheduled for removal in fiscal year 1997. The fuel line removal activities may impact the lessee at Parcel T009.

Notification. For the purposes of this lease, no notifications are required with respect to petroleum products and derivatives.

Restriction. The restrictions outlined in Section 6.2 shall also apply at Parcel T009 at which underground fuel lines have been found.

6.3

ASBESTOS-CONTAINING MATERIALS

An asbestos inspection was not conducted on Parcel T009. However, because of the age of the buildings within Reuse Zone 2A, asbestos-containing material (ACM) may be present within some of the buildings. The damaged, friable, and accessible ACM identified at buildings in Reuse Zone 2A will be abated by the Navy prior to the lease. According to the basewide EBS, ACM is present in insulation around the steam pipes on Parcel T009. Pipes are likely to be located in the walls and crawl spaces within the buildings as well as in the ground leading to the buildings. Because of access difficulties, it is unlikely that any asbestos-wrapped steam lines would pose a threat to human health.

Notification. For the purposes of this lease, no notifications are required with respect to ACM.

Restriction. The lease will require the lessee to conduct routine evaluations of the condition of existing ACM and comply with all applicable federal, state, and local laws relating to asbestos. Before reconstruction or remodeling, the lessee must submit plans to the Navy to prevent an inadvertent disturbance of potential ACM. For the purpose of this lease, the lessee will agree that during its use and occupancy of the property, it will bear all costs for managing the ACM properly. The Navy will require the lessee to (1) obtain written Navy approval before any construction or modification to any building or structure and (2) submit an ACM management plan to the Navy within 30 days of leasing the property.

6.4

LEAD-BASED PAINT (LOW-PRIORITY FACILITIES)

No lead-based paint survey has been conducted at the buildings in Reuse Zone 2A. DoD policy does not require lead-based paint surveys for commercial or industrial buildings unless the buildings will be reused for residential purposes. Buildings constructed prior to 1978 may contain lead-based paint. All three buildings in Reuse Zone 2A were built before 1978. In addition, lead may also be present in the soil surrounding the buildings.

The EPA and DTSC disagree with the DoD guidelines on lead-based paint. It is EPA's and DTSC's position that contamination of soil resulting from lead-based paint constitutes a CERCLA release.

Notification. Buildings built before 1978 may contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Lead exposure is especially harmful to young children and pregnant women. The lessee is hereby informed and does acknowledge that buildings located on Parcel T009 in Reuse Zone 2A may contain lead-based paint in the interior and exterior components of the building.

Restriction. The lessee shall not permit the use of the facilities for residential habitation unless the lessee has effectively eliminated lead-based paint hazards, in accordance with the "Guidelines for Evaluation and Control of Lead Based Paint Hazards in Housing," promulgated by the Department of Housing and Urban Development (1995) pursuant to Title X of U.S. Public Law 102-550. The term "residential" includes any house, apartment, or structure intended for human habitation, including but not limited to nondwelling facilities that may be commonly used by children under seven years of age such as a childcare facility, elementary school, or playground. The lease will require the lessee to monitor the condition of the existing lead-based paint, eliminate any hazard that develops from lead-based paint during the lease, and comply with all applicable laws and regulations relating to lead-based paint. The Navy will also require the lessee to obtain written Navy approval prior to any construction, modification, or demolition to any building or structure and to submit an appropriate lead-based paint remediation or disposal plan to the Navy prior to any construction or modification.

6.5

HAZARDOUS WASTE MANAGEMENT (BY LESSEE)

The lessee is not anticipated to use any regulated quantities of hazardous materials on the property.

Notification. For the purposes of this lease, no notifications are required with respect to hazardous waste management.

Restriction. The lessee will be required through the lease to comply with all applicable laws and regulations pertaining to the use, treatment, storage, disposal, and transport of hazardous materials.

7.0 SUMMARY OF LEASE RESTRICTIONS

Parcel T009 may be used pursuant to the proposed lease, with the following specified use restrictions in the lease:

- a) The lessee will be required through the lease to comply with all applicable laws and regulations pertaining to the use, treatment, storage, disposal, and transport of hazardous materials.
- b) The lessee shall not interfere with the ongoing IR and other environmental program activities. The lessee will be prohibited from damaging any existing or future groundwater monitoring wells, and will be responsible for any damage done to these wells.
- c) The lessee will be restricted from conducting excavation, drilling, or other ground-disturbing activities other than minor repairs of the pavement at Reuse Zone 2A without prior written Navy approval and Navy coordination with applicable federal and state regulatory agencies, as necessary. This lease restriction will not apply to routine landscaping activities.
- d) Use of groundwater at NAVSTA TI is prohibited. The lessee will be prohibited from installing any groundwater wells or otherwise using groundwater at the subject property. The lessee shall not damage existing or future groundwater monitoring wells. The lessee will be responsible for any damage it causes to the wells.
- e) It is possible that the lease area may remain accessible to and be occupied by the lessee during any remedial activities; in this case, access restrictions may include requiring the lessee to enter the leased premises via a specific route.

- f) The lessee will be required to conduct routine evaluations of the condition of existing ACM and to comply with all applicable federal, state, and local laws relating to asbestos. Before reconstruction or remodeling, the lessee must submit plans to the Navy to prevent an inadvertent disturbance of potential ACM. For the purposes of this lease, the lessee will agree that during its use and occupancy of the subject property, it will bear all costs for managing the ACM properly. The Navy will also require the lessee to (1) obtain written Navy approval prior to any construction or modification to any building or structure and (2) submit an ACM management plan to the Navy within 30 days of leasing the property.
- g) The lessee shall not permit the use of the facilities for residential habitation unless the lessee has effectively eliminated lead-based paint hazards. The lease will require the lessee to monitor the condition of the existing lead-based paint, eliminate any hazard that develops from lead-based paint during the lease, and comply with all applicable laws and regulations relating to lead-based paint. The Navy will also require the lessee to obtain written Navy approval prior to any construction, modification, or demolition to any building or structure and to submit an appropriate lead-based paint remediation or disposal plan to the Navy prior to any construction or modification.
- h) The lessee will be responsible for obtaining all necessary permits and licenses for their own operation. Any violation of permit conditions will be grounds to require the lessee to cease operations or to terminate the lease.
- i) Uses by the lessee are limited to a type and nature described in the lease document.

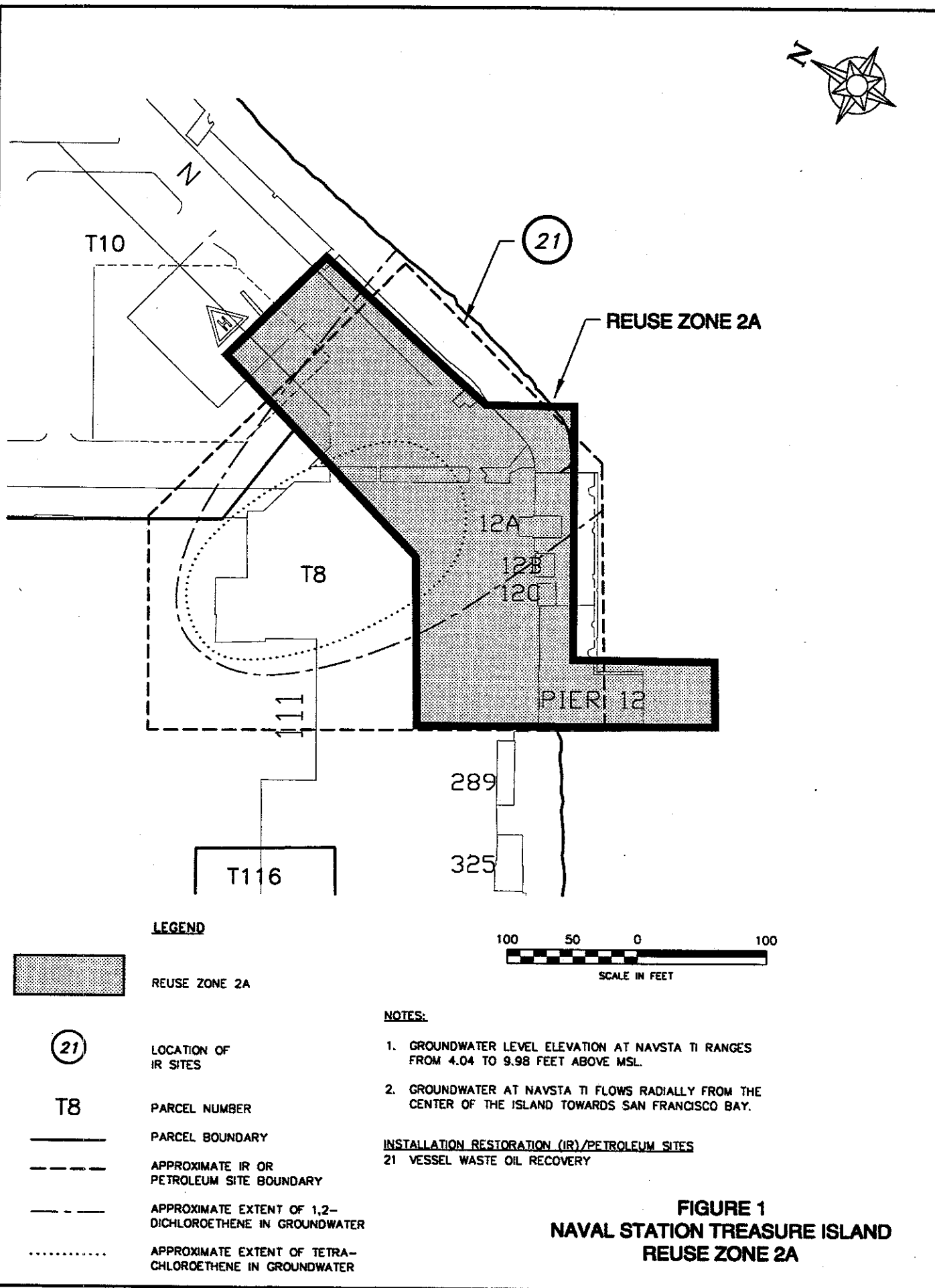
8.0 FINDING OF SUITABILITY TO LEASE

Based on the foregoing information and analysis, I find that the subject property (as identified in Section 2.0) is suitable to lease and may be used pursuant to the proposed lease, with the specified use restrictions in the lease, with acceptable risk to human health or the environment, and without interference with the environmental restoration process.

Date

ERNEST R. HUNTER
CAPTAIN, CEC, USN
Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command

FIGURE



TABLE

TABLE

ENVIRONMENTAL FACTORS AND RESOURCES CONSIDERED FOR REUSE ZONE 2A

Environmental Factors Considered	Lease Restriction or Notification Required?
Hazardous Substances (Notification)	No
Installation Restoration (IR) Program and Areas of Concern	Yes
Medical/Biohazardous Wastes	No
Oil/Water Separators	No
Unexploded Ordnance	No
Petroleum Products and Derivatives	Yes
Radioactive and Mixed Wastes	No
Storage Tanks	No
Asbestos	Yes
Drinking Water Quality	No
Indoor Air Quality	No
Lead-Based Paint (High-Priority Facilities)	No
Lead-Based Paint (Low-Priority Facilities)	Yes
Polychlorinated Biphenyls	No
Radon	No
Air Conformity/Air Permits	No
Energy (Utilities such as Natural Gas, Electric, and Coal)	No
Flood Plains	No
Hazardous Waste Management (by Lessee)	Yes
Historic Property (Archeological/Native American, Paleontological)	No
Occupational Safety and Health Administration	No
Outdoor Air Quality	No
Prime/Unique Farmlands	No
Sanitary Sewer Systems (Wastewater)	No
Sensitive Habitat	No
Septic Tanks (Wastewater)	No
Solid Wastes	No
Threatened/Endangered Species	No
Transportation	No
Wetlands	No



August 22, 1997

Ms. Amelia Duque
Engineer in Charge
Engineering Field Activity West
Naval Facilities Engineering Command
900 Commodore Drive, Building 208
San Bruno, CA 94066-2402

Subject: Final Finding of Suitability to Lease - Reuse Zone 2
Naval Station Treasure Island, California
CLEAN II Contract No. N62474-94-D-7609, Contract Task Order No. 126

Dear Ms. Duque:

Enclosed are twelve copies of the final Finding of Suitability to Lease (FOSL) for Reuse Zone 2 at Naval Station Treasure Island.

The Environmental Protection Agency (EPA) and California/EPA Department of Toxic Substances Control did not have comments on the draft final FOSL. However, as a result of Navy comments, some changes were made to the language in the "Summary of Lease Restrictions" section.

Please call me at (415) 222-8204 with any comments you may have.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. A. Sugerman", is written over the typed name.

Rebecca Sugerman
Project Manager

Enclosures

cc: Files